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September 18, 2023

VIA ECF

Hon. Nelson S. Román
United States District Court, Southern District of New York
300 Quarropas Street
White Plains, NY 10601

**Re: *Palisades Estate EOM, LLC, et al. v. County of Rockland, New York, et al.*,
Index No. 7:23-cv-04215-NSR
Requests for Pre-Motion Conference – Motions to Sever and Transfer**

Dear Judge Román,

We are counsel for the Plaintiffs in the above referenced action. We write in response to the letter filed by Defendant Town of Colonie (“Colonie”) on September 13, 2023 (ECF Doc. 297), seeking a pre-motion conference to move to sever the claims against it and change venue to the United States District Court for the Northern District of New York.

Plaintiffs oppose Colonie’s request for a pre-motion conference for the same reasons set forth in Plaintiffs’ August 28, 2023 letter opposing substantively identical requests made by other Defendants.¹ (ECF Doc. 290.) In addition, Plaintiffs reiterate their opposition to the letter request joined by Colonie (ECF Doc. 298) seeking to amend the briefing schedule for the consolidated motion for severance and transfer set forth by Your Honor. (ECF Doc. 295.) To the extent the Court grants Colonie leave to file its motion to sever and change venue, Plaintiffs request that Colonie’s motion follow the briefing schedule currently in place for the consolidated motion to sever and change venue.

We thank Your Honor for your attention to this matter.

Respectfully submitted,

/s/ Perry M. Amsellem

Perry M. Amsellem

¹ Specifically, Defendants Onondaga County, Oneida County, Town of Salina, Chautauqua County, Fulton County, Genessee County, Greene County, Herkimer County, Orleans County, Oswego County, Otsego County, Rennselaer County, Schoharie County, Tioga County, Wyoming County, Niagara County, Broome County, Madison County, and Saratoga County.